

**EPA Comment Number: 550-22**

Received: September 1, 1999

To: Homepage Oppts/DC/USEPA/US@EPA

cc:

Subject:

Re: Docket No. 97N-0074

Dear Council,

I am writing regarding the Food Safety issue. There are so many inadequacies and inhumane treatment involved in the 'food animal' industry, it's difficult to know where to begin, but I shall attempt it. I would like to see the following changes take place:

1. Food safety hazards must first and foremost be addressed at the source with mandatory safeguards at the animal production stage. Such safeguards should include more humane and hygienic treatment and conditions for farm animals. Short of this, any food safety plan is doomed to fail.
2. Regulatory authority at the production stage must be expanded, with adequate funding actively sought.

As you may or may not be aware, an animal's death at a SLAUGHTERHOUSE is 'hell on Earth.' Animals who are supposed to be stunned and rendered unconscious with stun guns and bullets move down the line fully conscious and in distress, often flailing and even falling off hooks onto the "kill line", injuring workers on a daily basis. Numerous employees on the kill floor shockingly admit that between thirty and fifty percent of the cows being slaughtered are fully conscious and alive as they move down the kill line. One worker shared gruesome accounts of suffering, terrified animals being regularly skinned alive at his station.

In the quickly moving processing line, workers do not have time to remove pus-filled abscesses found in the fresh-killed meat whizzing down the conveyor belt. They also don't have time to sanitize slabs of meat that sometimes fall to the floor and become contaminated. This meat is not removed from the line; instead, it is packaged for sale to grocery stores and school cafeterias throughout the state. One IBP employee readily admitted to concerns about e.coli and other health hazards resulting from unsanitary conditions.

Because of the continual push for increased production and line speeds, workers are frequently denied bathroom and lunch breaks. Women working on the line are forced to choose between urinating in their pants or taking a bathroom break and losing their job. (Source: NARN , Northwest Animal

Rights Network, June ,1999)

"Are you brave enough to admit that the one natural reservoir of E. Coli 0157:H7 has been proven to be the intestinal tract of cattle ? That the avenue of infection is feces splattered on our meat? That the disease which was extremely rare only a decade ago has now become the leading cause of kidney failure in US children ? That all this suffering is in direct correlation to the deregulatory programs of the last two administrations? -- Mary Heersink, founder, Safe tables Our Priority, to USDA officials at a hearing on meat inspection, June 1993".

Factory farm intensive confinement conditions result in severe physiological as well as behavioral afflictions in all farm animals. Anemia, influenza, intestinal diseases, mastitis, metritis, orthostasis, pneumonia, and scours are only the beginning of a long list of ailments. Factory farms are a breeding ground for stress and infectious diseases.

Medical doctors now warn that the tragedy of factory farming reaches well beyond the farm animals themselves. According to a broad spectrum of scientists, the high level of contaminants in factory farm products now poses a serious danger to human health. Studies in the New England Journal of Medicine and research by the U.S. Centers for Disease Control, National Resources Defense Council, and the FDA all warn that the levels of antibiotics and other contaminants in commercially raised meat constitute a serious threat to public health.

Approximately 50% of all antibiotics manufactured in the United States are poured directly into animal feeds. The most commonly used antibiotics are penicillin and tetracycline. The squandering of these important drugs in livestock production is wreaking havoc for physicians in the treatment of human illness.

Widespread overuse of antibiotics is resulting in the evolution of new strains of virulent bacteria whose resistance to antibiotics poses a great threat to human health. Doctors are now reporting that, due to their uncontrolled use on factory farms, these formerly life-saving drugs are often rendered useless in combating human disease. Dr. Jere Goyan, Dean of the School of Pharmacy at the University of California, San Francisco, states that the indiscriminate use of antibiotics in animal feed is leading to "a major national crisis in public health. Unless we take action now to curb the use of these drugs in the livestock industry, we will not be able to use them to treat human disease."

Dr. Karim Ahmed, head scientist of the National Resources Defense Council, has long urged Congress to impose immediate controls on the use of antibiotics in animal feed. According to Dr. Ahmed, unless swift action is taken, "we are going to have an epidemic of untreatable stomach ailments, many of which will end in death." Unfortunately, the crisis has already begun. Scientists now calculate that the misuse of penicillin and tetracycline in animal feed is implicated in more than 2,000,000 cases of Salmonella poisoning each year, resulting in as many as 2,000 human deaths. (Source: Humane Farming Association.)

The use of BGH hormone has made so many cows so sick. Melvin Vanheel of

Little Falls, Minnesota reported that ,after using BGH, "The majority of my cows had some health problem---mastitis, lumps and open sores at the infection site, heat stress, and so on. My vet finally said to quit using BGH."

Florida dairy farmer Charles Knight experienced such severe mastitis problems within his herd that his milk was rejected by his milk cooperative because of its high " pus " content. (Source: Humane Farming Association.)

Theres more "PUS" in the milk people drink, says the publisher of Consumer Reports magazine, thanks to higher infection rates in cows caused by the use of growth hormones. Oh, and to produce that milk, one dairy cow excretes 120 pounds of waste every day, as much as two dozen people. Manure from factory farms often ends up in our waterways.

Every year, when egg production drops, approximately 195 million hens in North America endure a bizarre torment called "FORCED MOLTING". This cruel practice throws the hens' systems into collapse, stressing and shocking their worn-out bodies into laying one more batch of eggs before being sent to slaughter. The frightened birds are deprived of food for up to two weeks, water is restricted for up to eight weeks.

USDA's own research shows that forced molting makes hens farm more susceptible to Salmonella, exacerbating the food safety issue already plaguing the egg industry. The studies show that forced molting increases the frequency and severity of Salmonella enteritidis among hens. The stressful conditions weaken their immune systems so badly that they become prone to disease and salmonella infections. It stated unmolted hens usually have to ingest about 50,000 Salmonella cells to become infected, molted hens need fewer than ten. The result is sick birds and contaminated eggs.

I hope you will 'fix' an industry that has such rampant cruelty and disease. It is time.

Sincerely,

Carol RS Treacy